Markus B.G. Oberg, OSB #112187 Daniel J. Park, OSB #132493 LE GROS BUCHANAN & PAUL 4025 Delridge Way SW, Suite 500 Seattle, Washington 98106-1271

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Attorneys for M/V AMIS INTEGRITY, in rem

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD,

Plaintiff.

v.

M/V AMIS INTEGRITY (IMO 9732412), her engines, freights, apparel, appurtenances, tackle, etc., *in rem*,

Defendant.

Case No. 3:19-cv-01671-IM

IN ADMIRALTY

STIPULATION FOR ORDER TO WITHDRAW FUNDS AND DISBURSE

STIPULATION

On February 11, 2020, the Court ordered Plaintiff Dry Bulk Singapore Pte. Ltd. ("Plaintiff") to post security in the amount of \$350,000.00 in relation to the counterclaim for wrongful arrest asserted by Defendant M/V AMIS INTEGRITY ("Defendant"). (ECF 60). On or about June 17, 2020, Tradewind GMBH, on behalf of Plaintiff, deposited \$350,000.00

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with the Clerk of Court (the "Countersecurity"). (ECF 94). The Clerk issued a Notice of Deposit stating that the Countersecurity was deposited into a non-interest bearing account, Receipt Number: ORX300089097. (ECF 94).

Plaintiff and Defendant have reached a settlement in this action and seek to resolve any remaining claims and counterclaims between them. Accordingly, the Parties stipulate and agree to the withdrawal and disbursement of the Countersecurity to Plaintiff and Defendant as follows:

Payment #1:

Payee: LeGros Buchanan & Paul, P.S. f/b/o Amis Integrity

Amount: One Hundred Seventy-Five Thousand And No/100 U.S.

Dollars

(\$175,000.00)

Address: LeGros Buchanan & Paul, P.S.

Attn: Markus Oberg

4025 Delridge Way SW, Ste. 500

Seattle, WA 98106

Payment #2:

Payee: Blank Rome LLP f/b/o Dry Bulk Singapore Pte. Ltd.

Amount: One Hundred Seventy-Five Thousand And No/100 U.S.

Dollars

(\$175,000.00)

Address: Blank Rome LLP

Attn: Jeremy A. Herschaft 717 Texas Avenue, Suite 1400

Houston, Texas 77002

A proposed order, prepared in accordance with LR 67-3, is filed with this Motion.

Upon the withdrawal and disbursement of the Countersecurity and completion of the other

STIPULATION FOR ORDER TO WITHDRAW FUNDS AND DISBURSE -

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settlement terms, including receipt of the forementioned payment by Defendant, the Parties will file a Stipulation for the Dismissal of this Action pursuant to Fed. R. Civ. P. 41(a)(1).

DATED this 10th day of May, 2023.

MILLER NASH LLP

s/ Ian M. Christy

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s/ John D. Kimball

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s/ Jeremy A. Herschaft

Jeremy A. Herschaft, *pro hac vice* Zachary Cain, *pro hac vice* 717 Texas Avenue, Suite 1400 Houston, Texas 77002

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Attorneys for Plaintiff

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s/Markus B.G. Oberg

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Attorneys for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to The Honorable Karin Immergut and serve it on all associated counsel.

I certify under penalty of perjury under the laws of the United States and the States of Washington and Oregon that the foregoing is true and correct.

Signed at Seattle, Washington this 10th day of May, 2023.

s/Jamie Porter

Jamie Porter, Legal Assistant LeGros Buchanan & Paul 4025 Delridge Way SW, Suite 500 Seattle, Washington 98106-1271 Telephone: 206-623-4990

Facsimile: 206-467-4828 E-mail: jporter@legros.com

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